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Via Electronic Transmission

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

***RE: The Federal Communications Commission's Notice of PS Docket No. 08-51:
911 Call Forwarding for Non-Service Initiated Phones***

Dear Commissioners,

Thank you for this opportunity to protect and serve survivors of the domestic violence.

In response to the PS Docket No. 08-51, The Survive2Thrive Foundation urges the continuation of 911 service to Non-Service Initiated (NSI) phones.

The need for access to 911 for domestic violence survivors

Survivors of domestic violence are often cut from their resources when they leave their violent homes and their abuser will use the resources they provide them as a tool of bargaining, manipulation, and control. For many abusers, when a victim leaves and takes back "control" of their lives by leaving their isolation and going to a shelter, their first impulsive reaction is to try and regain that control by cutting off access to resources – i.e. money (clearing bank accounts, etc.), shelter (kicking them out of their homes), and access to communication (turning off their cell phones if they can).

When a shelter gives a survivor a NSI phone, it takes away that tool for an abuser and gives the victim a sense of safety, privacy, and freedom, knowing that they can communicate with law enforcement without concern that their abuser can turn off their phone or use the phone to track them down.

NSI phones can also provide a way for victims to communicate with 911 without the abusers knowing about them doing so. The phone can aid a victim in getting the help and it is critical that victims have that access because an incident between victim and abuser can escalate quickly and turn deadly.

Battered shelters provide these phones as part of a safety strategy for those victims looking to leave their violence. It is a line of communication their abuser has no access to, either to call to or to call from. Their abusers cannot use these NSI phones to stalk and manipulate their victims.

The change in cell phone access

Many of the shelters our organization has worked with in the past would conduct cell phones drives to collect cell phones for their residents since access to landline and public telephone booths is virtually non-existent.

In the past 10 years, because of the availability of cell phone technology at free to low cost and with the introduction of cell phones without contracts and pay-as-you-go phones, the need for shelters to provide phones has declined. Many victims working with our program have their own phones and they choose to keep them because they feel that is the only way they can stay connected with their circles of influence during their displacement.

In our program, we have noticed a drop in the numbers of victims needing NSI phones BUT we would like to emphasize the dire importance of the NSI phones that are being distributed.

If a victim, at this point in time, needs a NSI phone from our program, they TRULY need it because they do not have the resources to get one of their own or they have left their phone when they left their violence because of its connection to their abuser. Those victims, who ask for an NSI phone from a domestic violence program, desperately need them and the 911 access it provides them currently.

Please continue to provide 911 access for NSI phones

Survive2Thrive urges the FCC to provide access to NSI phones for this very important reason. The demand for NSI phones may have gone down, but the phones being distributed are even more important to their victims' safety and accessibility because it may be the only line of communication between the victim and 911.

The Survive2Thrive Foundation understands the needs for the FCC to address the concern about 911 fraudulent calls but feels that because this small population of phones used by domestic violence survivors, has such great importance to the domestic violence victims using them, that they seek alternative solutions to this concern. 911 access for victims means the difference between life and death in many cases, so please allow victims that access to ensure their safety and the safety of their families.

Survive2Thrive Foundation is partnered with RapidSOS that provides an app that makes the use of 911 more efficient. The growing use of smartphones gives victims access to this app and other programs that make it possible for the a victim to communicate with law enforcement in the most dire of circumstances when they may not be able to speak. This technology is vital and it is our position that the FCC continues to entertain other strategies for their reduction of fraudulent calls to 911.

Our final comment is if a victim is given an NSI phone, they need it desperately and their NSI phone is their connection to those who can help them and their families at a moment's notice.

Thank you for your consideration of our comment,

Courtney Santana
Executive Director
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The Survive2Thrive Foundation

Our mission is to provide life-changing resources to domestic violence survivors who have been turned away from their local shelters and to create a sustainable recovery path to self-sufficiency for all survivors of domestic violence. Our program goals for the worthy survivors we support are: Safety and Stabilization, Resource Management, Confidence Building, and Self Sufficiency and Independence.